

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”, GREENHEART MUSIC LIMITED, a United Kingdom Limited Company, and GREENHEART MUSIC LIMITED, an Antigua and Barbuda Limited Company,

Plaintiffs,

– against –

DONALD J. TRUMP and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Action No. 1:20-cv-07103-JGK

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Edmond Grant dated September 15, 2023, and the exhibits annexed thereto, the Declaration of Brett Van Benthysen dated September 15, 2023, and the exhibits annexed thereto, the accompanying Memorandum of Law, the Statements of Material Facts, and the prior proceedings herein, plaintiffs Edmond Grant (“Grant”), Greenheart Music Limited, a United Kingdom Limited Company (“Greenheart UK”) and Greenheart Music Limited, an Antigua and Barbuda Limited Company (“Greenheart Antigua,” and together with Greenheart UK and Grant, “Plaintiffs”) by their attorneys Reitler Kailas & Rosenblatt LLP, will move this Court at the Courthouse located at 500 Pearl St., New York, New York, pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, for Summary Judgment as to liability against defendants Donald J. Trump (“Trump”) and Donald J. Trump for President, Inc. (the “Company,” and together with Trump, “Defendants”), and for such further relief as to this Court seems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order dated August 11, 2023, opposition papers shall be filed on or before October 6, 2023, and reply papers shall be filed on or before October 20, 2023.

Dated: September 15, 2023

Respectfully submitted,

By: s/ Brett Van Benthysen
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Attorneys for Plaintiffs